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## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2012\_01 Intermittent Loads Eligibility Criteria

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#### Submitted by

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<b>Address:</b>	
<b>Date submitted:</b>	April

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#### Submission

- Please provide your views on the proposal, including any objections or suggested revisions.**

System Management is pleased to make this submission on the

Rule Change Notice  
Title. Intermittent Loads Eligibility Criteria  
Ref. RC  
Standard Rule Change Process  
Date. February

#### **System Management does not agree with the interpretation of the eligibility of Intermittent Loads as given in the Rule Change Proposal**

The Rule Change Proposal notes the following clause enables a facility registered as a Load to be settled in the market if it has both an intermittent component and a non intermittent component

*“2.30B.10 iii. NL to be the maximum possible consumption behind that meter due to consumption which is not Intermittent Load but which is measured only by the meter which also measures the Intermittent Load. This has a negative value;”*



System Management also believes the following interpretation applies to this clause

*2.30B.2(a)(i). A generation system exists which can typically supply the maximum amount of load.*

Typically” should be interpreted to mean will be able to supply the load other than when the generator is on a forced, consequential or approved outage

System Management believes that the value of NL as defined in Appendix A of viii is not a quantity which can be verified independently with metered quantities

As clause - B does not provide for external scrutiny, it undermines the requirement for the market to become more transparent

Hence, System Management believes the Proposed Rule Change misses an opportunity to make the market more transparent, rather embeds a questionable methodology

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**2. Please provide an assessment whether the change will better facilitate the achievement of the Market Objectives.**

System Management believes that the Proposed Rule Change does not better facilitate the achievement of the Market Objectives.